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11 NEW ZEALAND TRADE & ENTERPRISE

12 UNITED STATES DISTRICT COURT
13
14 NORTHERN DISTRICT OF CALIFORNIA
15

16 DANIEL BROWN, an individual,
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18 Plaintiff,

19 vs.

20 NEW ZEALAND TRADE & ENTERPRISE, an
21 international government agency; and DOES 1
22 through 100, inclusive,
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24 Defendants.
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CASE NO. 3:24-CV-02838-RS

**JOINT STIPULATION TO CONTINUE
INITIAL CASE MANAGEMENT
CONFERENCE**

Date: August 22, 2024
Time: 10:00 AM
Judge: Judge Richard Seeborg

Complaint Filed: December 22, 2023

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

Plaintiff Daniel Brown (“Plaintiff”) and Defendant New Zealand Trade & Enterprise (“NZTE”) (Plaintiff and Defendant referred to collectively herein as “the Parties”) through their counsels of record, hereby stipulate and agree as follows:

WHEREAS, a Joint Case Management Conference statement is due on August 14, 2024;

WHEREAS, as an Initial Case Management Conference is set to take place on August 22, 2024;

WHEREAS, concurrently with the filing of this Stipulation, the Parties are filing a Stipulation and [Proposed] Order Selecting ADR Process, with the intent to hold an ADR session within 90 days from the date of the order referring this case to ADR;

WHEREAS, the Parties agree that it will conserve judicial and party resources and promote the orderly administration of justice for the Court to continue the Initial Management Conference while the Parties attempt to resolve this case through mediation. In light of the agreement to mediate, the Parties would like to avoid burdening the Court and to avoid spending the time and money associated with litigation in the event that they can resolve this case in mediation.

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1 NOW, THEREFORE, it is stipulated and agreed to by the between the Parties, by and through
2 their respective counsel of record, that the Rule 26(f) Scheduling Conference currently scheduled to
3 be heard by the Court on August 22, 2024, be continued by approximately ninety (90) days to
4 November 20, 2024, or as soon thereafter as may be determined by this Court.

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6 Dated: August 1, 2024

LITTLER MENDELSON, P.C.

8 /s/ Nicholas Gioiello

9 Gregory G. Iskander

10 Chad D. Greeson

Nicholas Gioiello

11 Attorneys for Defendant

NEW ZEALAND TRADE & ENTERPRISE

12 Dated: August 1, 2024

13 IARUSSO LEGAL, APC

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15 Michelle Iarusso

16 Attorneys for Plaintiff

17 DANIEL BROWN

ORDER

The Court, having reviewed the Parties' Joint Stipulation and good cause appearing therefore, hereby orders as follows:

IT IS HEREBY ORDERED that the Rule 26(f) Scheduling Conference currently scheduled to be heard by the Court on August 22, 2024, shall be continued to November 14, 2024. Joint Case Management Conference Statement due November 7, 2024.

IT IS SO ORDERED.

Dated: August 5, 2024



Judge Richard Seeborg

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